

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 18-24721-GLT
Curtis S. Anderson	: Chapter 13
Debtor	:
	: Related Doc: 121
Curtis S. Anderson,	:
Movant	: Hearing Date: 01/11/2023 at 10:00am
vs.	:
	:
CSMC 2022-JR1 Trust c/o Select Portfolio	:
Servicing, Inc.	:
Creditor/Respondent	:
and	:
Ronda J. Winnecour, Esquire	:
Trustee	:

**OBJECTION OF CSMC 2022-JR1 TRUST C/O SELECT PORTFOLIO SERVICING,
INC., TO DEBTOR'S MOTION FOR LOSS MITIGATION**

AND NOW, CSMC 2022-JR1 Trust c/o Select Portfolio Servicing, Inc. ("Respondent"), by its attorneys, Hladik, Onorato & Federman, LLP, hereby objects to the Motion for Loss Mitigation filed by Debtor, Curtis S. Anderson ("Debtor"), as follows:

1. On November 28, 2022, Debtor filed a Motion for Loss Mitigation regarding the property located at 16 Commons Drive, Bradford Woods, PA 15015.
2. Creditor hereby objects to Debtor's request for approval to participate in the Court's Loss Mitigation Program.
3. Upon review of the loan, Creditor has determined there are no retention options on the loan except for a Deed in Lieu.

WHEREFORE, Movant respectfully requests that this Honorable Court deny Debtor's request for approval to participate in the Loss Mitigation Program.

Respectfully Submitted,

HLADIK, ONORATO & FEDERMAN, LLP

Date: 11/30/2022

/s / Sarah K. McCaffery, Esquire
Sarah K. McCaffery, Esquire
Hladik, Onorato & Federman, LLP
298 Wissahickon Avenue
North Wales, PA 19454
Phone 215-855-9521
Email: smccaffery@hoflawgroup.com

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CERTIFICATE OF SERVICE

I, Sarah K. McCaffery, Esquire, attorney for Respondent, CSMC 2022-JR1 Trust c/o Select Portfolio Servicing, Inc., certify that I mailed a copy of the Objection to Debtor's Motion for Loss Mitigation to the following parties at the addresses below on 11/30/2022:

Donald R. Calaiaro, Esquire
Andrew Kevin Pratt, Esquire
David Z. Valencik, Esquire
Via CM/ECF Notification
Attorneys for Debtor

Curtis S. Anderson
16 Commons Drive
Bradfordwoods, PA 15015
Via First Class Mail
Debtor

Ronda J. Winnecour, Esquire
Via CM/ECF Notification
Trustee

Dated: 11/30/2022

/s/Sarah K. McCaffery, Esquire
Sarah K. McCaffery, Esquire ID# 311728
Hladik, Onorato & Federman, LLP
298 Wissahickon Avenue
North Wales, PA 19454
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Email: smccaffery@hoflawgroup.com